

31 July 2026

Sally Munk
Principal Planner
Department of Planning, Housing and Infrastructure

Dear Sally,

Re: Canterbury Bankstown City Council Submission to the State Significant Development Application, SSD-133259740 Secretary's Environmental Assessment Requirements (SEARs) – Chullora Waste Transfer Station

Thank you for the opportunity to provide comment in response to the applicant's submission for the State Significant Development (SSD) Application SSD-133259740 (SEARs request) for the construction and operation of Chullora Waste Transfer Station at 20 Dasea Street, Chullora.

Council has reviewed the scoping report prepared by Arup made available on the Department of Planning, Housing and Infrastructure's (Department) website, and enclosed with this letter is Council's response to the request for SEARs.

Based on our review, Council requests the applicant addresses the matters in this letter during the preparation of the Environmental Impact Statement. A summary of the requested matters is in Attachment A. Attachment B provides a more detailed information on these matters.

If you require any clarification or have any enquiries regarding the feedback provided, please contact Michaela Newman, Senior Strategic Planner on 9707 5754 or via email: michaela.newman@cbc.city.nsw.gov.au

Yours sincerely



Patrick Lebon
Coordinator Strategic Assessments
Canterbury Bankstown Council

Attachments:

- A – Matters to be addressed in the Environmental Impact Statement
- B – Detailed comments

Attachment A – Matters to be addressed in the Environmental Impact Statement

Issues / Matters for Consideration	Documentation to be provided
Biodiversity, tree retention and landscaping • The site and adjoining properties to the north and south are identified by Council as having biodiversity significance under the Canterbury-Bankstown Local Environmental Plan 2023 (CBLEP 2023). The proposed development therefore has potential to have on and off-site biodiversity impacts. • The EIS must adequately assess the biodiversity impacts of the proposal and determine whether the site contains, or has the capacity to support, Cooks River/Castlereagh Ironbark Forest or associated biodiversity values. • Council considers the following matters must be addressed in the EIS: – Details of all vegetation to be retained, protected and removed – Measures for the protection and management of retained vegetation during construction and operation – Rehabilitation and revegetation methodologies – Ongoing maintenance and monitoring requirements – Replacement planting using species of local provenance at a ratio of 3:1 for all trees removed from the site – Re-establishment of all vegetation structural layers, including canopy, midstorey and groundcover species.	Biodiversity Development Assessment Report (BDAR) Vegetation Management Plan (VMP) Arborist report (with site plan showing all trees to be removed)
Site management • The site is located adjacent to the Cooks River and the Yana Badu Wetlands at 16 Muir Road, Chullora. Any development on the site must be carefully managed during demolition, construction and operational phases to minimise impacts on these significant environmental features. • Council considers the following matters must be addressed in the EIS: – Appropriate sediment and erosion control measures in accordance with current industry guidelines – Protection measures for retained vegetation and root zones – Management of stockpiles, exposed soils and stormwater runoff – Inspection, maintenance and monitoring requirements; and – Procedures for the rectification of control failures.	Erosion and Sediment Control Plan
Transport • The Traffic Impact Assessment must assess the potential impacts of the proposal up to the maximum 800,000/tonnes per annum (tpa) as indicated in the SEARs scoping report. • To manage the impact of truck movement to and from the site, Council requests the EIS and supporting Traffic Impact Assessment includes mitigation measures such as truck scheduling, peak spreading, access controls and	Environmental Impact Statement Traffic Impact Assessment Traffic Management Plan

Issues / Matters for Consideration	Documentation to be provided
a Traffic Management Plan to be implemented during operation of the facility. Refer to Council's detailed comments in Attachment B. • The Traffic Impact Assessment must evaluate intersection performance, queuing, access, parking, pedestrian safety and cumulative traffic impacts on the surrounding area. • Any traffic management measures that require intersection upgrades or other road works must be clearly identified in terms of design, cost and delivery by the proponent. Council considers road/intersection upgrades as enabling works to support the site to function and not public benefits for the community.	
Flooding • The site is impacted by 1 in 100 year and Probable Maximum Flooding (PMF). • The EIS must address flood risk on the site (low to high) including any building design measures to ensure the development can withstand flooding events. • The NSW Flood Risk Management Manual (issued 2023) must be addressed in the EIS and a Flood Impact and Risk Assessment (FIRA) must be submitted.	Flood Impact and Risk Assessment

Attachment B – Detailed Comments

Category	Council Feedback
Resource Recovery (Waste Management)	The Resource Recovery section notes that the number of trucks identified to be incoming and outgoing the facility each week day and on weekends during phase 1 of the project seems less than what is expected. It is requested that the EIS further clarifies and confirms truck numbers.
Development Assessment	Development Assessment notes that parking will likely be a key issue, and requests that the EIS be supported by a Parking Assessment, addressing requirement relating to off street parking in Chapter 3.2 of the Canterbury Bankstown DCP. Development Assessment has also flagged the adjacent State Heritage item, noting that the Scoping Report advises a Heritage Impact Statement will be provided to support the EIS.
Biodiversity	The Scoping Report concludes that a Biodiversity Development Assessment Report (BDAR) is not required on the basis that the vegetation communities on the State Vegetation Type Map do not occur on the site. This conclusion is supported by the report through reference to: • The relatively low occurrence of species consistent with the mapped vegetation community; • The absence of the vegetation community in historical aerial imagery dating from 1943; and • The degraded condition of vegetation currently present, primarily as a result of heavy weed invasion. Council does not consider that these factors, in isolation, provide sufficient justification to discount the potential occurrence of the threatened ecological community Cooks River/Castlereagh Ironbark Forest. The NSW Scientific Committee's Final Determination for Cooks River/Castlereagh Ironbark Forest recognises that: • Some species may only be present within the soil seed bank and may not be represented by above-ground individuals at the time of survey. • Species composition is influenced by disturbance history, site size, and ecological processes such as fire regimes. • Diagnostic species lists are intended only as a guide to identification and should be interpreted with care, particularly in degraded sites where species diversity has been reduced. • The community is known to occur within the upper Cooks River catchment. • Disturbed remnants may still constitute part of the ecological community, particularly where natural soils and associated seed banks remain at least partially intact and the vegetation has the capacity to respond to assisted natural regeneration.

Category	Council Feedback
	Accordingly, the degraded condition of the vegetation and the apparent absence of many diagnostic species do not necessarily preclude the presence of the threatened ecological community. Additionally, the flora survey recorded a number of native species that are characteristic of, or associated with, Cooks River/Castlereagh Ironbark Forest vegetation. These include <i>Acacia falcata</i>, <i>Bursaria spinosa</i>, <i>Einadia nutans</i> and <i>Lomandra longifolia</i>, all of which are included within the species assemblage identified in the NSW Scientific Committee Final Determination. Additional native species recorded, including <i>Acacia implexa</i>, <i>Acacia longifolia</i>, <i>Acacia parramattensis</i>, <i>Dianella caerulea</i>, <i>Eucalyptus punctata</i> and <i>Eucalyptus tereticornis</i>, are consistent with vegetation occurring within the Cooks River/Castlereagh Ironbark Forest Plant Community Type. Given the known occurrence of Cooks River/Castlereagh Ironbark Forest within the locality and the uncertainty that remains regarding the ecological values of the site, including the potential presence of characteristic species within the soil seed bank, Council considers that the precautionary principle should be applied. On this basis, Council's view is that a Biodiversity Development Assessment Report (BDAR) should be required to adequately assess the biodiversity impacts of the proposal and to determine whether the site contains, or has the capacity to support, Cooks River/Castlereagh Ironbark Forest or associated biodiversity values. Coastal Wetlands – State Environmental Planning Policy (Resilience and Hazards) 2021 The proposal appears to propose impacts to land mapped as coastal wetlands under the State Environmental Planning Policy (Resilience and Hazards) 2021. The Scoping Report does not adequately address the potential impacts associated with this mapping, nor does it identify any assessment requirements arising from the proposed works. Council considers that further assessment is required to determine: • The extent of direct and indirect impacts on mapped coastal wetlands; • Whether the proposal constitutes designated development as a result of those impacts in accordance with clause 2.7 of the State Environmental Planning Policy (Resilience and Hazards) 2021; • The applicable approval pathway; and • Any avoidance, mitigation and offsetting measures required to minimise impacts on the coastal wetlands. These matters should be addressed in the Environmental Impact Statement. Vegetation Management Plan A comprehensive Vegetation Management Plan (VMP) should be prepared to support the proposal. The VMP should be prepared in accordance with contemporary ecological restoration and bushland management best practice and should include: • Details of all vegetation to be retained, protected and removed; • Measures for the protection and management of retained vegetation during construction and operation;

Category	Council Feedback
	• Rehabilitation and revegetation methodologies; • Ongoing maintenance and monitoring requirements; • Replacement planting using species of local provenance; and • Re-establishment of all vegetation structural layers, including canopy, midstorey and groundcover species. Where revegetation is proposed, species selection should be consistent with the characteristic species assemblage of Cooks River/Castlereagh Ironbark Forest to assist in restoring ecological function and local biodiversity values. Erosion and Sediment Control – <u>post consent requirement</u> An Erosion and Sediment Control Plan (ESCP) should be prepared by a suitably qualified practitioner and submitted for Council's approval. The ESCP must demonstrate how erosion, sedimentation and construction-related runoff will be managed to prevent impacts on retained vegetation, surrounding land, drainage infrastructure and downstream receiving environments. The plan should include: • Appropriate sediment and erosion control measures in accordance with current industry guidelines; • Protection measures for retained vegetation and root zones; • Management of stockpiles, exposed soils and stormwater runoff; • Inspection, maintenance and monitoring requirements; and • Procedures for the rectification of control failures. <i>The ESCP should be completed to Council's satisfaction prior to the issue of any Construction Certificate and implemented for the duration of the construction works.</i>
Traffic	Council's traffic engineers advise that the traffic impacts in Phase 1 are identified as moderate, and substantial in Phase 2. There will be an increase in heavy vehicle traffic along Dasea Street, Muir Road and Rookwood Road, with potential for congestion and delays nearby during peak hour periods. It is noted there is also potential conflict with Pacific National vehicle movements. Given the substantial increase in heavy vehicle movements anticipated under Phase 2 (up to 814 truck movements per day), the Applicant is requested to upgrade the pedestrian gap on the northern approach splitter island to current design standards. This would improve pedestrian safety, visibility and accessibility, particularly in light of the increased traffic volumes associated with the proposed development. It is recommended that as part of further assessment, consultation with TfNSW and Council should occur, to inform final traffic management measures.
Stormwater	Council's Stormwater Engineer provide the following comments: • The site is affected by low to high flood risk. The Chullora Waste Transfer Station Scoping Report (Arup, June 2026) noted that the Flood Impact and

Category	Council Feedback
	Risk Assessment (FIRA) is to be prepared to support the EIS. The FIRA shall be undertaken in accordance with the DCCEE Flood Risk Management Toolkit and the Flood Impact and Risk Assessment Guideline. • Council's currently adopted overland flow study for the catchment is Rookwood Road Stormwater Catchment Flood Study (BMT WBM, 2010). The Flooding and Stormwater Due Diligence Assessment (SLR Consulting, 27 Feb 2026) noted that no online report was available. The flood study report can be accessed via Council's website. Please note that Council is in the process of updating flood studies in the Cooks River catchment. • References have been made to superseded controls and standards. The proposed works shall be in accordance with the current Canterbury-Bankstown DCP 2023 and Development Engineering Standards 2023. The deposited plan (DP1007367) shows easements located within the site. Easement details should be confirmed and clearly shown on the plans. Refer to Canterbury Bankstown DCP 2023 – Engineering Standards Guide Section 8 for requirements on proposed structures adjacent to Council stormwater pipes and easements.
Payment of Section 7.12 Development Contributions	Development Contributions must be paid for this development before the issue of any construction certificate. The contributions are levied and applied under the Canterbury Bankstown Local Infrastructure Contributions Plan 2022 and Section 7.12 of the Environmental Planning and Assessment Act 1979. The contributions will be used to provide, extend or augment public amenities or public services. In the event of a development consent being issued by the Department of Planning, Housing and Infrastructure, Council requests a condition of consent is imposed that requires the applicant to pay the required contributions to Council prior to the issue of a Construction Certificate. No construction certificate is to be issued and no construction is to commence until payment of development contributions. The contribution must be paid to Council before the issue of any Construction Certificate. Construction of the development may NOT commence until the development contributions are paid. Indexing of the contribution amount to be paid: The development contribution payable will be adjusted, at the time of payment, to reflect Consumer Price Index increases which have occurred since the "Consent to operate from date" which appears on the front page of this Determination Notice. Applicants should contact Council's Customer Service team on (02) 9707 9000 or council@cbc.city.nsw.gov.au to be advised of the current contribution payable and how to pay.



DOC26/390887-2

5 August 2026

Sally Munk
Industry Assessments
Department of Planning, Housing and Infrastructure
Locked Bag 5022
PARRAMATTA NSW 2124

Via the Major Projects Portal (PAE-133261990)

**EPA's Recommended Secretary's Environmental Assessment Requirements –
Chullora Waste Transfer Station – SSD-133259740**

Dear Sally

I am writing in response to your request for the NSW Environment Protection Authority's (EPA's) Secretary's Environmental Assessment Requirements (SEARs) for the Chullora Waste Transfer Station (Proposal).

The EPA has reviewed the supplied Chullora Waste Transfer Station Scoping Report (ARUP June 2026).

The EPA understands the proposal is for the development and operation of the site in 2 phases:

- Phase 1 – Development of the site to process up to 150,000t/a (2028-2030)
 - Site preparation, demolition, construction and commissioning of the facility to support Phase 1
 - Primarily truck-based receipt of waste mixed waste
- Phase 2 – Development of the site to process up to 800,000t/a (from 2030/31)
 - Development of site infrastructure to support rail access
 - Increase to full-scale operation with rail-based receipt of mixed waste

The proposal is within a premises that currently holds Environment Protection Licence 21108 issued under the *Protection of the Environment Operations Act 1997* (POEO Act), for Waste Storage.

The EPA has considered the details of the proposal and provides the recommended SEARs as **Attachment A**. In carrying out the assessment, the proponent should refer to the relevant guidelines listed, as well as any relevant industry codes of practice and best practice management guidelines.

The Proponent should be made aware that any commitments made in the environmental assessment may be formalised as approval conditions and may also be placed as formal licence conditions. Consistent with Part 9.4 of the POEO Act the EPA may require the provision of a financial

NSW Environment Protection Authority

As the environmental steward and regulator of our State we are committed to a sustainable future. Join us on our mission to protect tomorrow together.

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assurance and/or assurances. The amount and form of the assurance(s) would be determined by the EPA and required as a condition of the licence.

If you have any questions about this request, please contact Gabby Sutherland via email at environmentprotection.planning@epa.nsw.gov.au.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Jackson', with a stylized flourish at the end.

CHRISTIE JACKSON
Unit Head – Industry Assessments
NSW Environment Protection Authority

ATTACHMENT A

EPA's Recommended Secretary's Environmental Assessment Requirements – Chullora Waste Transfer Station – SSD-133259740

1. Environmental Impacts of the Project

- 1.1. The description should include the following for both the construction and operation of the project:
 - a. Details of the premises covered by the project including any relationship with any existing Environment Protection Licences
 - b. the layout of all the physical elements of the project within the project area, including all buildings, structures, works, haulage activities, pollution controls, stockpile and material handling areas, sealed and unsealed areas, landscaping and open space.
 - c. all mitigation measures that will be built into the physical layout and design of the project (such as noise walls)
 - d. any ancillary infrastructure for which approval is being sought (such as upgrades to utilities or surrounding roads)
 - e. identify those components of the physical layout and design that may change during the detailed design of the project, and set clear limits within which this change may occur without requiring amendments to the DA or modifications to the development consent if the project is approved
 - f. plans showing the layout and design in plan-view and cross section.
- 1.2. Identify any likely interactions between the development and any existing/approved developments and land uses in the area.
- 1.3. Identify all sensitive receivers likely to be affected by the development using clear maps/plans, including key landform areas, such as conservation areas and waterways.
- 1.4. Identify all potential environmental emissions, assess the likely environmental impacts, and describe the proposed mitigation measures to minimise environmental pollution to achieve compliance with relevant environmental legislation, policies, and guidelines.
- 1.5. The EIS must accurately summarise the key findings of the detailed technical studies in the appendices of the EIS and use suitable cross-referencing to reduce repetition between the two parts of the EIS.

2. EPA Licensing and Approval Requirements

- 2.1. Identify all approvals and licences required under environment protection legislation including details of all scheduled activities under schedule 1 of the *Protection of the Environment Operations Act 1997*.
- 2.2. Outline how the proposal and its environmental protection measures would be implemented and managed so as to demonstrate that the proposal is capable of complying with statutory obligations under EPA licences or approvals (e.g. outline of an environmental management plan).

3. Construction Works

- 3.1. The EIS must include detail of the construction works including:
 - a. any earthworks or site clearing; re-use and disposal of cleared material (including use of spoil on-site).

- b. Identify, characterise and classify the following in accordance with the EPA's *Waste Classification Guidelines (2014)*:

- i. all waste that will be generated onsite through excavation, demolition or construction activities, including proposed quantities of the waste;
- ii. all waste that is to be removed to an offsite location, including proposed quantities. Include the commitment to ensure this waste is taken to a facility that can lawfully receive it.

Note: The EPA's *Waste Classification Guidelines (2014)* are available at: <https://www.epa.nsw.gov.au/your-environment/waste/classifying-waste>

- c. construction timetable and staging; hours of construction; proposed construction methods.
 - d. environment protection measures, including noise mitigation measures - in accordance with the Interim Construction Noise Guideline (DECC, 2009), dust control measures and erosion, and sediment control measures- in accordance with Managing urban stormwater: Soils and construction, vol. 1 (Landcom 2004).
- 3.2. Include a site diagram showing the site layout and location of environmental controls.
 - 3.3. Construction noise associated with the proposed development should be assessed using the *Interim Construction Noise Guideline* (DECC, 2009). These are available at: <https://www.epa.nsw.gov.au/your-environment/noise/industrial-noise/construction-noise>

4. Air issues

- 4.1. The EIS must demonstrate the proposal's ability to comply with the relevant regulatory framework, specifically the POEO Act and the *Protection of the Environment Operations (Clean Air) Regulation 2022*. This consideration should include section 129 of the POEO Act concerning control of "offensive odour".
- 4.2. The EIS must include an air quality impact assessment (AQIA). The AQIA must be carried out in accordance with the document, *Approved Methods for the Modelling and Assessment of Air Pollutants in NSW* (2022). These are available at: <https://www.epa.nsw.gov.au/your-environment/air/industrial-emissions/approved-methods-for-the-modelling-and-assessment-of-air-pollutants>
- 4.3. The EIS must detail emission control techniques/practices that will be employed at the site and identify how the proposed control techniques/practices will meet the requirements of the POEO Act, *POEO (Clean Air) Regulation* (2022) and criteria within *Approved Methods for the Modelling and Assessment of Air Pollutants in NSW* (2022).

5. Noise and Vibration

The EIS must assess the following noise and vibration aspects of the proposed development:

- 5.1. Operational and construction activities on the premises that maybe considered vibration intensive should be assessed using the guidelines contained in the *Assessing Vibration: a technical guideline* (DEC, 2006). These are available at: <https://www.epa.nsw.gov.au/your-environment/noise/industrial-noise/assessing-vibration>
- 5.2. If blasting is required for any reasons during the construction or operational stage of the proposed development, blast impacts should be demonstrated to be capable of complying with the guidelines contained in *Australian and New Zealand Environment Council – Technical basis for guidelines to minimise annoyance due to blasting overpressure and ground vibration* (ANZEC, 1990). These are available at: <https://www.epa.nsw.gov.au/your-environment/noise/industrial-noise/construction-noise>
- 5.3. Operational noise from noise intensive activities to be undertaken on the premises should be assessed using the guidelines contained in the *NSW Noise Policy for Industry* (EPA, 2017).

Available at: [https://www.epa.nsw.gov.au/your-environment/noise/industrial-noise/noise-policy-for-industry-\(2017\)](https://www.epa.nsw.gov.au/your-environment/noise/industrial-noise/noise-policy-for-industry-(2017))

- 5.4. If applicable, noise on public roads from increased road traffic generated by land use developments other than road projects should be assessed using the guidelines contained in the *NSW Road Noise Policy* (EPA, 2011) and associated application notes. Available at: <https://www.epa.nsw.gov.au/your-environment/noise/transport-noise>.
- 5.5. If applicable, noise on rail lines from increased rail traffic generated by land-use developments other than rail projects should be assessed using the guidelines contained in the *Rail Infrastructure Noise Guideline* (EPA, 2013) and associated application notes. Available at: <https://www.epa.nsw.gov.au/your-environment/noise/transport-noise>.

6. Waste, Chemicals and Hazardous Materials and Radiation

The EIS must assess the following waste, chemical and hazardous materials related aspects of the proposed development:

- 6.1. Assess and describe all aspects of waste generation, management and disposal associated with the proposed development.
- 6.2. Demonstrate compliance with all regulatory requirements outlined in the POEO Act and associated waste regulations.
- 6.3. Outline contingency plans for any event that may result in environmental harm, such as excessive stockpiling of material, or dirty water volumes exceeding the storage capacity available on-site.
- 6.4. Demonstrate that appropriate spill containment will be provided for storage, filling and loading of all fuels and other chemicals to be used on site, in accordance with all relevant Australian Standards, and/or NSW EPA's *Storing and Handling of Liquids: Environment Protection-Participants Manual* (DECC, 2007).
- 6.5. Identify if the proposed development will use or manufacture any Schedule 6 or Schedule 7 chemicals listed on the NSW IChEMS register and identify relevant risk management measures for all industrial chemicals that are proposed to be used or manufactured. Additionally, demonstrate a system for periodic review to ensure that any new NSW IChEMS Register requirements are identified.
- 6.6. Assess and describe any potential risks relating to all known and potential contaminants of concern (CoC) including per- and polyfluoroalkyl substances (PFAS) that may be associated with the proposed development and if applicable, how they will be mitigated. Consideration should be given to potential health and environment related impacts caused by the CoC. The assessment should consider various sources, receptors and exposure pathways including but not limited to ingestion (drinking water and food consumption), inhalation, and dermal contact.
- 6.7. Identify the measures that would be implemented to ensure that the development is consistent with the aims, objectives and guidance in the *NSW Waste and Sustainable Materials Strategy 2041 Stage 1: 2021-2027*. Available at: <https://www.epa.nsw.gov.au/Your-environment/Recycling-and-reuse/Strategic-direction-for-waste-in-NSW/Waste-and-Sustainable-Materials-Strategy>.
- 6.8. This waste facility will be required to report on the amount of waste being handled:
 - a. If it is located within or receives waste from the Metropolitan Levy Area (MLA) or Regional Levy Area (RLA), a weighbridge will need to be installed and it will need to report monthly. If it is located within the Non-Levied Area (NLA), and only receives waste from the NLA, then it will need to report annually.
 - b. Document how you will comply with Clause 36 of the *Protection of the Environment (Waste) Regulation 2018*. This Clause includes requirements regarding the installation

and calibration of a weighbridge, vehicle flow plans, weighbridge software and associated recording and reporting requirements.

- c. Document how you will comply with the EPA's waste levy benchmark requirements including the software to be used.
- d. Nominate the upper limit of the amount of waste that may be stockpiled at your facility at any one time. This nominated amount will be considered when determining the maximum authorised amount of waste that may be at your facility at any time.
- e. Ensure that the facility complies with the waste levy requirements for the levy area in which it is located. Information about levy areas is available at <https://www.epa.nsw.gov.au/your-environment/waste/waste-levy/levy-regulated-area-and-levy-rates>.

6.9. If the facility proposes to provide residual waste for use in an energy recovery facility:

- a. Demonstrate how the proposed management of the residual waste is consistent with the NSW EPA's *Energy from Waste Technical Note and Framework*, including that the residual waste is generated following a resource recovery process that maximises the recovery of reusable and recyclable materials, and that no reasonable and feasible higher-order use of the residual waste is available.

6.10. For Resource Recovery sites recovering waste plastics:

- a. Identify and assess potential microplastic discharge pathways to the environment, considering both environmental vectors (e.g. stormwater, flooding, wind dispersion, and fire events) and operational factors (e.g. wastewater generation, on-site containment systems, processing methods, and material handling practices). This should include an evaluation of how microplastics may be mobilised under both routine operations and abnormal conditions.
- b. Implement mitigation and control measures to prevent offsite microplastic release. This includes appropriate containment infrastructure, wastewater treatment and filtration systems, routine plant maintenance, and operational management practices, including monitoring.
- c. Outline contingency plans to address accidental releases, including controls during storage, handling, plant maintenance, and transport of recovered plastics to downstream processing facilities.

7. Water

The EIS surface water quality assessment must:

- 7.1. Demonstrate that all practical measures to prevent, control, abate or mitigate water pollution have been implemented, including a description of options that were explored (such as reuse to avoid a discharge or treatment).
- 7.2. Provide details of the proposal that are essential for predicting and assessing potential impacts to receiving waters. This could include (but is not limited to):
 - a. Site layout, including details of the existing and proposed water management system.
 - b. Drainage map for the entire site identifying sub-catchments, flow paths, drainage infrastructure, design sizing of structures, water storages, discharge points, and any potential flow paths to receiving waters.
 - c. How stormwater will be managed in all phases of the project. Information should include, where appropriate, measures to avoid or minimise erosion, leachate generation, and sediment mobilisation at the site.
 - d. Any in-water activities (such as piling or dredging).
- 7.3. Include water balance(s) for ground and surface water, including any intake and discharge locations, volumes, frequency and duration.

- 7.4. Identify and estimate the quality and quantity of all pollutants that may be introduced into the water cycle by source and discharge point, including residual discharges after mitigation measures are implemented. This should be undertaken for construction and operational phases.
- 7.5. Include a water pollution impact assessment undertaken consistent with the guidance available at <https://www.epa.nsw.gov.au/your-environment/water/managing-water-pollution-in-nsw/environment-protection-licensing/water-pollution-discharge-assessments>. The level of assessment should be commensurate with the risk to the environment and human health.
- 7.6. Describe any surface water quality monitoring programs, including proposed monitoring locations, frequency and indicators of surface water quality. Analytical limits of reporting should have regard to any identified guideline values. Water quality monitoring should be undertaken in accordance with the *Approved Methods for the Sampling and Analysis of Water Pollutants in NSW* (2004) available at: [Approved methods for the sampling and analysis of water pollutants in NSW | EPA](#)
- 7.7. The EIS must describe how stormwater will be managed in all phases of the project, including details of how stormwater and runoff will be managed to minimise pollution. Information should include measures to be implemented to minimise erosion, leachate and sediment mobilisation at the site. The EIS should consider the guidelines *Managing urban stormwater: soils and construction*, vol. 1 (Landcom 2004) and vol. 2 (A. Installation of services; C. Unsealed roads; D. Main Roads; E. Mines and quarries) (DECC, 2008).

8. Groundwater

- 8.1. Provide details of the project that are essential for predicting and assessing impacts to groundwater with a description of the existing environment, including:
 - a. Geological, topographical, and hydrogeological resource descriptions, maps, and cross-sections.
 - b. Assessment of groundwater quality, users of groundwater, existing bores including depths and construction, assessment of local land use.
 - c. A hydrogeological interpretation of water-bearing geological units, depth to water table, groundwater gradient, Conceptual hydrogeological model, assessment of groundwater dependent ecosystems.
 - d. Site map and cross-sections showing and characterising any proposed excavations and spoil emplacement (relative to water table) with topography.
 - e. Proposed groundwater monitoring program.
 - f. Assessment should be in accordance with Groundwater assessment toolbox for major projects in NSW - Overview document (DPE, 2022) - [https://publications.water.nsw.gov.au/watergroupjspsui/bitstream/100/888/1/Groundwater assessment toolbox for major projects in NSW - Overview document.pdf](https://publications.water.nsw.gov.au/watergroupjspsui/bitstream/100/888/1/Groundwater%20assessment%20toolbox%20for%20major%20projects%20in%20NSW%20-%20Overview%20document.pdf)

9. Soils

- 9.1. The EIS should include an assessment of the potential impacts on soil and land resources should be undertaken, being guided by the *Soil and Landscape Issues in Environmental Impact Assessment* (DLWC 2000). The nature and extent of any significant impacts should be identified. Particular attention should be given to:
 - a. Soil erosion and sediment transport- in accordance with *Managing urban stormwater: Soils and construction*, vol. 1 (Landcom 2004) and vol. 2 (A. Installation of services; B Waste landfills; C Unsealed Roads; D Main Roles) (DECC2008).
 - b. Mass movement (landslides) – in accordance with *Landslide risk management guidelines* presented in *the Australian Geomechanics Society* (2007).

- c. Urban and regional salinity – guidance given in the *Local Government Salinity Initiative* booklets which includes *Site Investigation for Urban Salinity* (DLWC, 2002).

- 9.2. A description of the mitigation and management options that will be used to prevent, control, abate or minimise identified soil and land resource impacts associated with the project. This should include an assessment of the effectiveness and reliability of the measures and any residual impacts after these measures are implemented. Where required, add any specific assessment requirements relevant to the project.

10. Contamination

- 10.1. Identify the likelihood of contamination at the site and surrounding land (on different media such as soils, groundwater, ground gas, surface water and sediments, where applicable) by considering the context of past, current, and proposed land uses. The EIS must document how the assessment of contaminated land has been undertaken with regard to the relevant guidelines for contaminated land made or approved by the NSW EPA.
- 10.2. All reports on contamination must be prepared by a suitably qualified contaminated land consultant⁽¹⁾ who is also certified⁽²⁾.

(1) A suitably qualified and experienced contaminated land consultant is a contaminated land consultant who meets the competencies outlined in the Guideline on the Competencies and Acceptance of Environmental Auditors and Related Professionals (Schedule B9) as provided in the ASC National Environment Protection (Assessment of Site Contamination) Measure 1999 (as amended in 2013)."

(2) A certified consultant is a consultant certified under either the Environment Institute of Australia and New Zealand's Certified Environmental Practitioner (Site Contamination) scheme (CEnvP(SC)) or the Soil Science Australia Certified Professional Soil Scientist Contaminated Site Assessment and Management (CPSS CSAM) scheme;

Note: If an auditor is being engaged for the project, the requirement for a certified consultant to prepare the contaminated land reports is still recommended as it will help ensure all assessment work is done as efficiently as possible, but it is optional. However, it must still be required for all reports to be prepared by a suitably qualified contaminated land consultant.

- 10.3. Where contamination is considered likely based on past or current land uses or other factors (such as offsite contamination migrating onto the site), undertake detailed site investigation/s to determine the nature and extent of the contamination.
- 10.4. Where contamination exists, assess if remediation of the land is required, having regard to current and future land uses; and the ecological and human health risks posed by the contamination to both onsite and offsite receptors.
- 10.5. Where a detailed site investigation is prepared and/or remediation is considered necessary, a NSW EPA accredited Site Auditor must be engaged to undertake an audit. The EIS must include copies of any Interim Audit Advice provided by the auditor and a Site Audit Statement and Site Audit Reports issued by the auditor which certifies the site can be made suitable for the proposed use
- 10.6. The following references should be included as relevant guidelines that must be followed *when assessing contaminated land*:
 - a. *Managing Land Contamination: Planning Guidelines SEPP 55 – Remediation of Land (DUAP and EPA, 1998)* - <https://www.epa.nsw.gov.au/sites/default/files/managing-contaminated-land-guidelines-remediation.pdf>
 - b. *Guidelines on the Duty to Report Contamination under the Contaminated Land Management Act 1997 (EPA, 2015)*

- c. *Contaminated land sampling design guidelines - Part 1 and 2 (EPA, 2022)*
- d. *Consultants reporting on contaminated land: contaminated land guidelines (EPA, 2020)*
- e. *Guidelines for the NSW Site Auditor scheme 3rd edition (EPA, 2017)*
- f. Any other relevant guidelines made or approved by the EPA under s105 of the *Contaminated Land Management Act 1997* - <https://www.epa.nsw.gov.au/your-environment/contaminated-land/statutory-guidelines>

11. Climate Change

- 11.1. The Environmental Impact Statement (EIS) must provide Scope 1 and Scope 2 Greenhouse Gas (GHG) emissions estimates associated with the proposed development. The EIS is to confirm whether the proposal is likely to result in 25,000 tonnes CO₂-e or more of Scope 1 and 2 emissions in any financial year.
- 11.2. If the proposed development will generate less than 25,000 tonnes per annum of CO₂-e in any financial year, then the project is not expected to trigger the assessment requirements under NSW Guide for Large Emitters (Large Emitters Guide).
- 11.3. If the estimated emissions exceed the 25,000 tonnes per annum of CO₂-e threshold in any financial year during the project's operational life, then the EIS must include a GHG assessment prepared in accordance with the Large Emitters Guide. Where the proponent believes that certain requirements from the Large Emitters Guide are not applicable, the proponent may indicate that in the EIS but is to provide sufficient justification.
- 11.4. The following references should be considered in the EIS (where applicable):
 - a. For coal mine projects: Please refer to Greenhouse Gas Mitigation Guide for NSW Coal Mines
 - b. For agricultural projects: Please refer to NSW EPA Guide for Large Emitters – information for agricultural proponents and climate change requirements for agricultural licensees (<https://www.epa.nsw.gov.au/Your-environment/Climate-change/climate-change-requirements-licensees/agriculture>)
 - c. For landfill projects: Please refer to climate change requirements for landfill licensees (<https://www.epa.nsw.gov.au/Your-environment/Climate-change/climate-change-requirements-licensees/landfill>)

NOTE: The NSW EPA is preparing guidance for the preparation and implementation of various climate change related guidelines, including but not limited to Climate Change Mitigation and Adaptation Plans. The EPA advises that preparation of Climate Change Mitigation and Adaptation Plan (CCMAP) may be required under the EPA's regulatory framework, including conditions in the Environment Protection Licence.



File Ref. No: FRN26/2294 BFS26/5307 7000003243
TRIM Doc. No: D26/107539
Contact: Senior Firefighter Sarah Tobin

16 July 2026

SALLY MUNK
NSW Department of Planning, Housing and Infrastructure
Locked Bag 5022
PARRAMATTA NSW 2124

Dear Sally,

Re: Advice on Secretary's Environmental Assessment Requirements (SEARs) – CHULLORA WASTE TRANSFER STATION – 20 DASEA ST CHULLORA NSW 2190 (SSD-133259740).

Fire and Rescue NSW (FRNSW) acknowledge correspondence received on 10 July 2026, requesting input into the preparation of the SEARs for the CHULLORA WASTE TRANSFER STATION – 20 DASEA ST CHULLORA NSW 2190 (SSD-133259740). FRNSW have reviewed the SEARs along with the Scoping Report with particular focus to Sections 6.1.2 and Appendix C).

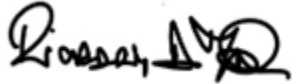
The Scoping Report details a Waste Facility. It has been the experience of FRNSW that Waste Facilities present special problems of fighting fire and suitable additional provisions are likely to be required in accordance with E1D17 and E2D21 of the National Construction Code 2022¹.

FRNSW will likely recommend a Fire Safety Study (FSS) be developed in accordance with the Hazardous Industry Planning Advisory Paper No 2² as a condition of consent. The FSS should be used to inform the design and as such it is FRNSW Position³ that the FSS be developed to the satisfaction of FRNSW prior to any further submission being made to FRNSW; this includes: an Initial Fire Safety Report (IFSR) and / or Performance-Based Design Brief / Fire Engineering Brief Questionnaire (FEBQ).

The FSS should be prepared consistent with the relevant FRNSW Fire Safety Guidelines and FRNSW Technical Information Sheets⁴ with particular focus to Fire safety in waste facilities⁵ and Access for fire brigade vehicles and firefighters⁶.

Project proponents undertaking the FSS are to engage directly with FRNSW by submitting all correspondence electronically to FireSafety@fire.nsw.gov.au and reference FRNSW file number FRN26/2294. Further information regarding FRNSW Meetings⁷ and FRNSW Written Reports⁸ can be found at the FRNSW Building Fire Safety Industry Portal⁹.

Yours sincerely,



Station Officer Richard Jay
Manager
Fire Safety Liaison Unit

Cc: sally.munk@dphi.nsw.gov.au

¹ <https://ncc.abcb.gov.au/editions/ncc-2022>

² <https://www.planning.nsw.gov.au/sites/default/files/2023-03/hazardous-and-offensive-planning-advisory-paper-no-2-fire-safety-study-guidelines.pdf>

³ <https://www.fire.nsw.gov.au/page.php?id=9447&position=51>

⁴ <https://www.fire.nsw.gov.au/page.php?id=9166>

⁵ https://www.fire.nsw.gov.au/gallery/files/pdf/guidelines/guidelines_fire_safety_in_waste_facilities.pdf

⁶ https://www.fire.nsw.gov.au/gallery/files/pdf/guidelines/guidelines_access_for_emergency_vehicles.pdf

⁷ <https://www.fire.nsw.gov.au/page.php?id=9193>

⁸ <https://www.fire.nsw.gov.au/page.php?id=9156>

⁹ <https://www.fire.nsw.gov.au/page.php?id=9140>

23 July 2026

TfNSW Reference: SYD26/00712/01

DPHI Reference: SSD-133259740



Ms Kiersten Fishburn
Secretary
Department of Planning, Housing and Infrastructure
Locked Bag 5022
Parramatta NSW 2124

Attention: Sally Munk

**REQUEST FOR SECRETARY'S ENVIRONMENTAL ASSESSMENT REQUIREMENTS (SEARS)
CHULLORA WASTE TRANSFER STATION
20 DASEA STREET, CHULLORA**

Dear Ms Fishburn,

Thank you for providing Transport for NSW (**TfNSW**) an opportunity to provide input to the Secretary's Environmental Assessment Requirements (**SEARs**), for the abovementioned State Significant Development Application (**SSDA**).

TfNSW has reviewed the Scoping Report prepared by ARUP on 30 June 2026 and provides assessment requirements and comments in **TAB A** for the consideration of the Department of Planning, Housing and Infrastructure (**DPHI**).

Should you have any questions regarding the above matter, please contact Jim Tsirimiagos, Land Use Planner on 0412 376 198 or by email at development.sydney@transport.nsw.gov.au.

Yours sincerely,

Rachel Davis
Senior Land Use Planner
Transport Planning Branch
Planning, Integration and Passenger

TAB A – TfNSW Assessment Requirements and Comments

1. Transport Impact Assessment (TIA): A TIA shall be prepared in accordance with the *Guide to Transport Impact Assessment (GTIA)*. GTIA replaces the Guide to Traffic Generating Developments and can be found at this [link](#). The TIA will enable TfNSW to understand the impacts the development may have on the transport network, as well as the impacts to the state classified road network resulting from increased vehicular, bus and pedestrian/active transport movements. The TIA must include, but not be limited to, the following:
 - Details of all traffic types and volumes likely to be generated during construction and operation. Traffic flows are to be shown diagrammatically to a level of detail sufficient for easy interpretation.
 - An assessment of the predicted impacts of development traffic on road safety and the capacity of the road network, including consideration of cumulative impacts of nearby approved developments at key intersections (e.g. Dasea Street/Muir Road, Muir Road/Rookwood Road and Muir Road/Hume Highway) using SIDRA.
 - Identification of any necessary road network infrastructure upgrades (e.g. signage, pedestrian facilities, intersection upgrades, etc.) that are required to mitigate the development impact on the classified road network (Rookwood Road and Hume Highway), in terms of safety and efficiency for both vehicles and pedestrians. Any required/proposed road network infrastructure upgrades/mitigation measures along Rookwood Road and Hume Highway should be developed in consultation with TfNSW.
 - A review of the crash data along the identified transport route/s and key nearby intersections for the most recent 5-year reporting period and an assessment of the safety implications of the proposed development and required mitigation measures.
 - Plans demonstrating how all vehicles likely to be generated during construction and operation and awaiting loading, unloading, or servicing can be accommodated on the site to avoid queuing in the street network.
2. Consultation with relevant rail authority: in relation to Phase 2 of the Project, TfNSW requests that the Applicant consult with the Australian Rail Track Corporation (ARTC) and Sydney Trains with respect to the proposed rail haulage and any impacts within the Chullora site.

10 July 2026

ATT: Department of Planning, Industry
and Environment



24-28 Campbell St
Sydney NSW 2000
All mail to
GPO Box 4009
Sydney NSW 2001
T +61 2 13 13 65
ausgrid.com.au

Dear Sally Munk,

In reference to request for Secretary's Environmental Assessment Requirements (SEARs) for
the Chullora Waste Transfer Station SSD-133259740

Ausgrid recommends the addition of the following to the SEARS under Utilities:

In consultation with relevant agencies prepare a services and utilities impact assessment which:

- assesses the capacity of existing services and utilities and identify any upgrades required to facilitate the development
- assesses the impacts of the proposal on existing utility infrastructure and service provider assets and describe how any potential impacts would be managed.

Please do not hesitate to contact me for further information.

Regards,

A handwritten signature in black ink, appearing to read "Paul Nakhle", with a long horizontal stroke extending to the right.

Paul Nakhle - Portfolio Manager - Asset Protection | Transmission Services
02 9269 7587 | 0419 631 174

Connecting communities,
empowering lives



DCA reference number:

PAE-133264238

DPHI/Major Projects reference:

SSD-133259740

Date of issue:

05 August 2026

**DCA Technical Advisory advice – State Significant Development -
Chullora Waste Transfer Station (20 Dasea Street, Chullora NSW) –
Advice on SEARs**



1. Project details

Project name	Chullora Waste Transfer Station
DPHI/Major Projects reference:	SSD-133259740
Proponent	Cleanaway
Current stage of assessment	Pre-SEARs
Description of development:	Construction & operation of a waste transfer station
Primary address	20 Dasea Street, Chullora
Land description (Lot/DP)	Part of Lot 35 DP1007367
Local government area (LGA)	Canterbury-Bankstown



2. Assessment section

2.1 DCA Environment, Biodiversity & Heritage

Heritage	
Advice Summary	The subject site is near the Cooks River. Aboriginal Cultural Heritage SEARs are recommended. The following State Heritage Register (SHR) items are located within, or in the immediate vicinity of, the subject site: • item no. 01334 - Pressure Tunnel Shaft No. 1 & associated infrastructure • item no. 01630 - Pressure Tunnel and Shafts • item no. 01333 - Potts Hill Reservoirs 1 & 2 and Site • item no. 01744 - Lidcombe Hospital Precinct Environmental Heritage SEARs are recommended.
Detailed advice	None
Documents reviewed	Chullora Waste Transfer Station Scoping Report, dated June 2026.
Additional information	None
Recommended assessment requirements	

Recommended Aboriginal Cultural Heritage SEARs

The Environmental Impact Statement should be informed by an Aboriginal Cultural Heritage Assessment Report (ACHAR), prepared in accordance with relevant policy and guidelines to identify, describe and assess any impacts on Aboriginal cultural heritage sites or values associated with the project. The ACHAR must be prepared in accordance with the *Guide to investigating, assessing and reporting on Aboriginal cultural heritage in NSW*

<https://www.environment.nsw.gov.au/publications/guide-investigating-assessing-and-reporting-aboriginal-cultural-heritage-new-south-wales> and the *Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW*



<https://www.environment.nsw.gov.au/publications/code-practice-archaeological-investigation-aboriginal-objects-nsw> , and include the results of archaeological surveys and any required test excavations undertaken in accordance with the relevant standards and requirements.

- Provide evidence of adequate and continuous consultation with Aboriginal parties in determining and assessing impacts, identifying and selecting avoidance options, and developing appropriate mitigation measures (including the final proposed measures), in substantial accordance with the *Aboriginal cultural heritage consultation requirements for proponents* <https://www.environment.nsw.gov.au/publications/aboriginal-cultural-heritage-consultation-requirements-proponents>

Recommended Environmental Heritage SEARs

A suitably qualified heritage consultant is to:

- a. Identify all heritage items within the site and its vicinity including built heritage, landscapes and archaeology, map these items, and assess why the items and site(s) are of heritage significance.
- b. Assess the impacts of the proposal on any identified heritage items in accordance with the Guidelines for Preparing Statements of Heritage Impact. Discuss the attempts to avoid and/or mitigate the impact on the heritage significance of the site and the surrounding heritage items including any options analysis.
- c. Assess the visual impacts of the proposal on any heritage item(s) within the view catchment of the proposal.
- d. If impacts on potential historical archaeology are identified, an historical archaeological assessment should be prepared by a suitably qualified archaeologist in accordance with the guidelines Archaeological Assessment and Assessing Significance for Historical Archaeological Sites and Relics.



Biodiversity

Advice summary

Standard SEARs are advised. A section of the lot contains Biodiversity Values (BV) mapping. Potential impacts of areas of BV mapping require assessment through a Biodiversity Development Assessment Report.

Detailed advice

None

Documents reviewed

- Chullora Waster Transfer Station Scoping Report (Arup, 2026)
- Biodiversity Values Map and Threshold Tool (NSW Government 2026)

Additional information

None

Recommended assessment requirements

1. The EIS should be informed by a Biodiversity Development Assessment Report (BDAR). A BDAR should be prepared in accordance with the Biodiversity Assessment Method 2020.
2. Biodiversity impacts related to the proposed development are to be assessed in accordance with the Biodiversity Assessment Method 2020 and documented in a Biodiversity Development Assessment Report (BDAR). The BDAR must include information in the form detailed in the *Biodiversity Conservation Act 2016* (s6.12), Biodiversity Conservation Regulation 2017 (s6.8) and Biodiversity Assessment Method 2020.
3. The BDAR must document the application of the avoid, minimise and offset framework including assessing all direct, indirect and prescribed impacts in accordance with the Biodiversity Assessment Method 2020.



2.2 DCA Water Advisory

DCA Water	
Advice Summary	Cleanaway proposes to construct and operate the Chullora Waste Transfer Station (WTS) (the Project) on part of 20 Dasea Street, Chullora NSW 2190, within Lot 35 DP1007367. Standard SEARs are adequate.
Detailed advice	See below SEARs input.
Documents reviewed	Chullora Waster Transfer Station Scoping Report (DOC26/168051)
Additional information	None
Recommended assessment requirements	

Water Take and Licensing

1. A detailed and consolidated site water balance.
2. Description of all works/activities that may intercept, extract, use, divert or receive surface water and/or groundwater. This includes the description of any development, activities or structures that will intercept, interfere with or remove groundwater, both temporary and permanent.
3. Details of all water take associated with construction and operation of the development. This is to include water taken directly and indirectly, and the relevant water source where water entitlements are required to account for the water take.
If water is proposed to be supplied from a third party, confirmation should be provided by the supplier that the appropriate volumes can be obtained.
4. Details of Water Access Licences (WALs) held to account for any take of water where required, or demonstration that WALs can be obtained prior to take of water occurring. Any exemptions or exclusions to requiring approvals or licenses under the *Water Management Act 2000* should be detailed by the proponent.



Surface and Groundwater Impacts

5. A description of groundwater conditions that provides an understanding of groundwater level across the site under a range of wet and dry conditions.
6. Assessment of impacts on surface and ground water sources (both quality and quantity), related infrastructure, adjacent licensed water users, basic landholder rights, watercourses, riparian land, groundwater dependent ecosystems, and ground water levels; including measures proposed to reduce and mitigate these impacts.
7. Proposed surface and groundwater monitoring activities and methodologies.

Work on Waterfront Land

8. Identification and impact assessment of all works/activities located on waterfront land including an assessment against Guidelines for Controlled Activities on Waterfront Land (DCCEEW 2025).
-